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February 29, 2016

Marlene H. Dortch, Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, D.C. 20554

Re: EB Docket No. 06-36  
**Final** Annual 47 C.F.R. § 64.2009(e) CPNI Certification  
Covering Calendar Year 2015

Progress International, LLC  
Form 499 Filer ID 825928

Dear Ms. Dortch:

On behalf of Progress International, LLC, and pursuant to Section 64.2009(e) of FCC rules, submitted herewith is the carrier's CPNI certification for 2015 with accompanying statement.

**This is the final CPNI certification** for Progress International, LLC, which conducted no operations and provided no telecommunications or interconnected VoIP services during 2015. The carrier will file no annual CPNI certifications in future years.

Should any questions arise regarding this submission, please contact the undersigned.

Very truly yours,



Pamela L. Gist

Enclosures

**FINAL**

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket No. 06-36**

Final Annual 64.2009(e) CPNI Certification covering calendar year 2015

Date filed: February 29, 2016

Name of company covered by this certification:

Progress International, LLC

Form 499 Filer ID: 825928

Address: 10190 Katy Freeway, Suite 410  
Houston, Texas 77043-5218

Name of signing officer: Adrian Moreno Rico

Title of signatory: Officer/Secretary

**CERTIFICATION**

I, Adrian Moreno Rico, hereby certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

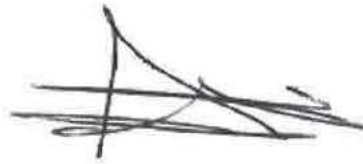
During 2015 Progress International, LLC conducted no operations and provided no telecommunications or interconnected VoIP services. This certification is the company's final certification of compliance with the Customer Proprietary Network Information rules. Progress International, LLC will not file a certification in 2017 or in future years covering the prior calendar year.

For the record, the company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

Attached to this certification is an accompanying statement explaining the company's procedures, during the time it operated, that ensured that the company was in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



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Name: Adrian Moreno Rico  
Title: Officer/Secretary  
Date: February 29, 2016

**Attachment:** Accompanying Statement explaining CPNI procedures

Company Name ("Carrier"): Progress International, LLC

### STATEMENT

During its years of operation, which have ceased, Carrier established operating procedures that ensured compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier did not provide end user services in the United States. Carrier provided services only to other carriers. Carrier did not use proprietary information for any other purpose than to provide service to other carriers.
- Carrier did not use proprietary information for its own marketing efforts. Carrier did not use, disclose or permit access to CPNI for the purpose of providing or marketing services of its affiliate or third parties.
- Carrier substantial processes and controls for both physical security and access to data. Customers were provided services under contracts with express confidentiality provisions. They had dedicated account representatives with access to customer data.
- Carrier maintained and utilized CPNI for the limited purposes of initiating, rendering, billing and collecting for its services, and could use CPNI, if necessary, to protect its property rights, or to protect other carriers from fraudulent, abusive or unlawful use of, or subscription to Carrier's services.
- Carrier continually educated and trained its employees regarding the appropriate use of CPNI. Carrier established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier maintained a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.
- Carrier's customer service representatives did not have access to call detail information. Carrier ensured that access to all call detail information was safeguarded from improper use or disclosure by employees and to discover and protect against attempts by third parties to gain unauthorized access to this information. Carrier instituted restrictions regarding access, use and disclosure of such records.
- Carrier did not disclose call record information over the telephone, or in person, and did not provide for customer on-line access to card or call information. Password and other authentication process were not applicable in this environment.
- Carrier established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.

- Carrier took the following actions against data brokers in 2015, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: : No actions taken
- The following is information Carrier has with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps carriers are taking to protect CPNI: No information received
- The following is a summary of all customer complaints received in 2015 regarding the unauthorized release of CPNI:
  - Number of customer complaints Carrier received in 2015 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: No complaints received
  - Category of complaint:
    - 0 Number of instances of improper access by employees
    - 0 Number of instances of improper disclosure to individuals not authorized to receive the information
    - 0 Number of instances of improper access to online information by individuals not authorized to view the information
    - 0 Number of other instances of improper access or disclosure
  - Summary of customer complaints received in 2015 concerning the unauthorized release of CPNI: Not Applicable